

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-  
Form Complaint and:

Robert Massey, et al. v. National Football  
League, et al. (Plaintiffs Lydell Mitchell  
and Jeanette Mitchell ONLY)

Court File No. 2:12-cv-6069-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFFS LYDELL  
MITCHELL AND JEANETTE  
MITCHELL**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Lydell Mitchell and Jeanette Mitchell only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Massey, et al. v. National Football League, et al.*, No. 2:12-cv-6069-AB, in the Eastern District of Pennsylvania on September 27, 2012, for the benefit of several retired National Football League players, including Lydell Mitchell and Jeanette Mitchell.

2. Plaintiffs' counsel filed a short form complaint for Lydell Mitchell and Jeanette Mitchell on October 29, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs Lydell Mitchell, Jeanette Mitchell, and the undersigned.

4. Plaintiffs' counsel properly notified Lydell Mitchell and Jeanette Mitchell of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Lydell Mitchell and Jeanette Mitchell only in Court File No. 2:12-cv-6069-AB.

Dated: May 30, 2019

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

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